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October 2, 2023

VIA CM/ECF

The Honorable Laura T. Swain
U.S. District Court of the Southern District of New York
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New York, NY 10007

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MEMO ENDORSED

Re: *Donna Wood, et al. v. Mike Bloomberg 2020, Inc.*, No 20 Civ. 2489 (LTS) (GWG)

Dear Chief Judge Swain:

We represent Defendant Mike Bloomberg 2020, Inc. (the “Campaign”) in the above-referenced matter. Pursuant to the Parties’ Stipulated Confidentiality Agreement and Protective Order entered in this action (Dkt. 169, the “Protective Order”), as well as the Court’s Individual Practices 5(b)(ii), the Campaign hereby seeks leave to file portions of the Campaign’s Opposition to Plaintiffs’ Motion for Class Certification, and an accompanying exhibit, with redactions. Specifically, the Campaign seeks leave to file Exhibit 2 (Angulo Tr. Excerpts) to the Declaration of Elise M. Bloom with redactions.

This exhibit was filed with redactions because Plaintiff designated portions of this transcript “Confidential” pursuant to the Protective Order. The Campaign also applied redactions to the Campaign’s publicly-field Opposition to Plaintiffs’ Motion for Class Certification in instances where the designated material was quoted or described.

Pursuant to Rule 5(b)(ii) of this Court’s Individual Practices, and the Protective Order, because Plaintiffs have designated the material as Confidential, Plaintiffs must submit, within three days, an application explaining why sealing of references to the deposition’s subject matter is justified.

For the foregoing reasons, the Campaign respectfully requests that the Court grant the Campaign’s motion for leave to file under seal pending the Court’s decision on Plaintiffs’ forthcoming application to the Court to justify the proposed sealing.

Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom

The foregoing request is granted. The material will remain sealed pending resolution of the Plaintiffs’ anticipated request to maintain the sealed filing status. This resolves docket entry no. 404. SO ORDERED.

cc: All Counsel of Record (via CM/ECF)

10/02/2023

/s/ Laura Taylor Swain, Chief U.S.D.J.